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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10
11 TONYA HALE,) CASE NO. 2:19-cv-00780-JCM-VCF
12)
13 Plaintiff,) UNOPPOSED MOTION TO EXTEND TIME
14 vs.) FOR DEFENDANTS TO FILE
15) RESPONSIVE PLEADINGS TO
16 THE COSMOPOLITAN OF LAS VEGAS;) PLAINTIFF'S COMPLAINT
17 NV PROPERTY 1, LLC dba THE)
COSMOPOLITAN OF LAS VEGAS, a)
Nevada Limited Liability Company;)
RICHARD SHERMAN, an individual,)
18)
19 Defendants.)
20)
21)
22)

23 COMES NOW the Plaintiff, Tonya Hale ("Plaintiff" or "Hale"), and pursuant to Fed. R.
24 Civ. P. 6(b), respectfully submits this Unopposed Motion to Extend Time for Defendants to File
25 Responsive Pleadings to Plaintiff's Complaint until July 31, 2019. No previous request for
26 extension has been made and this motion is submitted prior to the expiration of the original time
27 period for responsive pleadings.

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1. On May 6, 2019, Hale, through her counsel, filed a Complaint against Defendants Richard Sherman (“Sherman”) and The Cosmopolitan, NV Property 1, LLC d/b/a The Cosmopolitan of Las Vegas (“TCOLV”) (Sherman and TCOLV collectively referred to as “Defendants”). Both Defendants have been served with the Complaint.

2. The current due date for responsive pleadings on behalf of the respective Defendants has not yet expired. Plaintiff understands that both of the Defendants deny liability in this matter.

3. Plaintiff has been in contact with representatives of TCOLV. TCOLV has requested an extension of time for all Defendants to file responsive pleadings through July 31, 2019. Plaintiff does not object to this request.

4. Accordingly, there is good cause to postpone the responsive pleading deadline since doing so will allow the parties to effectively use their resources to attempt to reach a potential resolution, will further the ends of justice by affording the Defendants time to adequately respond to the claims and allegations in the Complaint if resolution is not reached, and will promote judicial economy.

WHEREFORE, Plaintiff respectfully requests that this Court grant this Unopposed Motion to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint until July 31, 2019.

The undersigned, counsel of record for Plaintiff TONYA HALE certify that there are no known interested parties other than those participating in the case.

DATED: 6/11/2019

LAW OFFICES OF MICHAEL P. BALABAN

BY: /s/ Michael P. Balaban
Michael P. Balaban, Esq.
LAW OFFICES OF MICHAEL P. BALABAN
10726 Del Rudini Street
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ORDER

Upon consideration of Plaintiff's Unopposed Motion to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint, it is:

ORDERED, that the Unopposed Motion to Extend Time for Defendants to File Responsive Pleadings to Plaintiff's Complaint be, and hereby is, GRANTED, and it is

FURTHER ORDERED that Defendants shall serve their responsive pleadings on or before July 31, 2019.

IT IS SO ORDERED

United States Magistrate Judge

June 11, 2019

DATED: _____